



GAVIN NEWSOM
Mayor

JARED BLUMENFELD
Director

August 6, 2004

Via email and First Class Mail

Ms. Melinda Hall
Cal/EPA Office of the Secretary
Cal/EPA Environmental Justice Program
P.O. Box 2815
Sacramento, CA 95812

Re: CCSF Department of the Environment's Comments on Cal/EPA's Intra-Agency EJ Strategy

Dear Ms. Hall:

On behalf of the City and County of San Francisco, Department of the Environment ("SFE"), we are pleased to submit the following comments on California Environmental Protection Agency's (Cal/EPA) Intra-Agency Environmental Justice Strategy (July 2004 Draft). We understand that the Cal/EPA Intra-Agency Environmental Justice Strategy builds on the report and recommendations that were endorsed last year by the Cal/EPA Interagency Working Group on Environmental Justice, and provides an overarching vision and general framework for Cal/EPA's Boards, Departments and Office (BDOs) as they move forward in integrating environmental justice (EJ) into their programs, policies and activities.

In general, we support the Cal/EPA's Intra-Agency Environmental Justice Strategy. We agree that the Cal/EPA's BDOs should advance the four main goals as outlined in the Strategy: (1) meaningful public participation and community capacity building; (2) integration of EJ into programs, policies and activities; (3) improve research and data collection; and (4) ensure cross-media coordination and accountability. However, we wish to urge you to clarify and emphasize the importance of integrating the precautionary principle into Cal/EPA's Intra-Agency EJ Strategy. Under Goal #2, Objective E, the Strategy states, "Identify where a precautionary approach is currently being used, or could be used, to address environmental justice issues." This statement can be strengthened by a clear policy directive requiring Cal/EPA's BDO to apply the precautionary principle, through examination of a range of alternatives using the best available science and consideration of the alternative with the least potential threat to human health and the environment.

As part of our efforts to implement the precautionary principle, San Francisco is developing an environmental preferable purchasing program, adopted a new Green Building ordinance for municipal and commercial buildings, and operating a less-toxic integrated pest management program, among other activities. We are pleased that Cal/EPA has emphasized the precautionary principle as part of the short-term, action-focused planning process, called the EJ Action Plan. We encourage you to emphasize the precautionary principle in the long-term strategic planning process as well.

Sincerely,

Jared Blumenfeld
Director